

EXHIBIT K

Exhibit 42

Stuart Breslow
October 09, 2020

42 to 45

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<p>1 - STUART BRESLOW -</p> <p>2 managing programmers or engineers in your role as</p> <p>3 chief compliance officer?</p> <p>4 A. The team of 250 people who worked in</p> <p>5 the group who were subject to my strategic</p> <p>6 direction were a mix of programmers, engineers,</p> <p>7 solutions architects, product managers. So my own</p> <p>8 sense is that I was more of the manager of that</p> <p>9 program -- I was strategic manager of that</p> <p>10 program at least from 2005 to 2016 because that</p> <p>11 was -- that was probably the major initiative in</p> <p>12 the compliance group.</p> <p>13 Q. Were those -- that group of 250, were</p> <p>14 they considered to be part of the compliance</p> <p>15 department or part of the IT group?</p> <p>16 A. They were part of the IT department</p> <p>17 and they reported to the IT department, but they</p> <p>18 were responsive to our strategic decision-making.</p> <p>19 So by way of contrast, before I went</p> <p>20 back to Morgan Stanley the -- the IT department</p> <p>21 basically told the compliance department what they</p> <p>22 were working on. When I returned to Morgan</p> <p>23 Stanley, I -- I made the decision, and the IT</p> <p>24 department agreed, that the strategic direction</p> <p>25 would be set by me; and so I was the one who set</p>	<p>1 - STUART BRESLOW -</p> <p>2 Morgan Stanley.</p> <p>3 Q. In the last year you were there?</p> <p>4 A. Not the last -- the last year I was</p> <p>5 doing more advisory work for the general counsel,</p> <p>6 so probably the last -- the two years before that.</p> <p>7 Q. Well, I think you said you were</p> <p>8 exploring it. If you used a different word, I</p> <p>9 apologize. Had Morgan Stanley actually adopted</p> <p>10 machine learning at that point in time?</p> <p>11 A. I don't recall.</p> <p>12 Q. Do you have a Ph.D. or Masters of</p> <p>13 Science in computer science?</p> <p>14 A. I do not.</p> <p>15 Q. Do you have a Ph.D. or Master of</p> <p>16 Science in a related technical field --</p> <p>17 MR. GAGE: Objection.</p> <p>18 Q. -- of computer science?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. We went through my background before.</p> <p>21 You know that I have a JD from Columbia University</p> <p>22 School of Law. That's my -- my -- my final</p> <p>23 educational experience.</p> <p>24 Q. And so is the answer no, you do not</p> <p>25 have a Ph.D. or MS in the technical field related</p>
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<p>1 - STUART BRESLOW -</p> <p>2 the strategic direction and the tactical projects</p> <p>3 they were working on as opposed to the other way</p> <p>4 around. This is what it had been when I wasn't</p> <p>5 there.</p> <p>6 Q. So is it fair to say that compliance</p> <p>7 was the business partner that that IT group was</p> <p>8 supporting?</p> <p>9 A. Correct.</p> <p>10 Q. In any of the roles that we've</p> <p>11 discussed thus far, did you work with cloud</p> <p>12 technology?</p> <p>13 A. No.</p> <p>14 Q. In any of the roles that we've</p> <p>15 discussed thus far, did you work with machine</p> <p>16 learning?</p> <p>17 A. Yes.</p> <p>18 Q. In what capacity?</p> <p>19 A. Machine learning was -- machine</p> <p>20 learning became foundational to compliance systems</p> <p>21 and we were exploring ways to use machine learning</p> <p>22 in what we were doing.</p> <p>23 Q. During what period of time?</p> <p>24 A. Later, later in time. I don't know</p> <p>25 precisely when, but towards the end of my time at</p>	<p>1 - STUART BRESLOW -</p> <p>2 to computer science.</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. That's a different question than the</p> <p>5 one you just asked, so the answer is no.</p> <p>6 Q. Have you ever built an engineering</p> <p>7 team?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. Well, at Google Cloud yeah, we</p> <p>10 created an engineering team to support the</p> <p>11 financial services vertical.</p> <p>12 Q. Okay. In the roles that we've</p> <p>13 discussed thus far ending with your time as an</p> <p>14 advisor -- as partner at McKinsey in 2017 or 2018,</p> <p>15 up until that point in time had you ever built an</p> <p>16 engineering team?</p> <p>17 A. No.</p> <p>18 MR. GAGE: Objection.</p> <p>19 Q. Up through the end of your time at</p> <p>20 McKinsey in 2018, had you ever managed an</p> <p>21 engineering team?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Again, you know, just to be</p> <p>24 con -- it's question of what you mean by</p> <p>25 "managed," but again I make reference to the team</p>

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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	that supported my group for which I provided	2	Q. Okay.
3	strategic direction and tactical direction at	3	MS. GREENE: We have been going about
4	Morgan Stanley.	4	an hour. I don't know if anyone is in need
5	Q. And apart from that you never	5	of a break. If so, this would be a good time
6	directly managed an engineering team, correct?	6	for a five-minute break or I'm happy to
7	A. No.	7	continue pushing on.
8	Q. Do you have any technical --	8	MR. GAGE: You can keep going.
9	A. I'm sorry, I guess the answer to that	9	THE VIDEOGRAPHER: Okay standby. The
10	question would be yes because you said "never," so	10	time is 10:29 a.m. and we're going off the
11	I think you want me to say yes and not no. I	11	record.
12	apologize for speaking over you.	12	(Whereupon, there was a brief recess
13	Q. So the answer is you never managed an	13	in the proceedings.)
14	engineering team directly, correct?	14	THE VIDEOGRAPHER: The time is 10:36
15	MR. GAGE: Objection.	15	a.m. and we're back the record.
16	A. Yes.	16	Q. Mr. Breslow, when did you join
17	Q. Have you had any technical training	17	Google?
18	with respect to computer science?	18	A. July, 2018.
19	A. No.	19	Q. And how did you come to join Google?
20	Q. Have you had any technical training	20	A. I was recruited.
21	with respect to computer engineering?	21	Q. By whom?
22	A. No.	22	A. Tariq Shaukat, T-A-R-I-Q
23	Q. Have you had any technical training	23	S-H-A-U-K-A-T.
24	with respect to coding?	24	Q. Did you know Mr. Shaukat prior to
25	A. No.	25	being recruited by him?
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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	Q. Have you had any technical training	2	A. I did not. I received a phone call
3	with respect to programming?	3	from Spencer Stuart that they were conducting an
4	A. No.	4	executive search and I participated in the search
5	Q. Do you know how to code?	5	and that's how I met Tariq.
6	A. No.	6	Q. Do you know how Spencer Stuart got
7	Q. Do you know how to program?	7	your name?
8	A. I'm sorry, what's -- what's the	8	A. I -- I don't. I assume it was some
9	question?	9	mix of I had spoken to them several times over the
10	Q. Do you know how to do computer	10	years when I was at Morgan Stanley. As I was
11	programming?	11	retiring I talked about opportunities with one of
12	A. What was the question before that?	12	their senior partners, and then obviously
13	Maybe I missed it. I thought that was the same	13	my -- as you've seen, my resume is on LinkedIn and
14	question.	14	I have a fairly good reputation, so they thought I
15	Q. First I asked if you know how to	15	might fill the bill.
16	code.	16	Q. Who is Ruth Porat?
17	A. No, then you said do you know how to	17	A. Ruth Porat is the chief financial
18	program and then you said do I know how to	18	officer of Alphabet.
19	computer program, is that --	19	Q. And do you know her?
20	Q. Let me just ask a few questions just	20	A. I do.
21	to make sure the record is clear. Do you know how	21	Q. How do you know her?
22	to code?	22	A. Probably -- and I don't remember
23	A. No.	23	whether it was 1988 or 1989 -- she was the
24	Q. Do you know how to program?	24	mergers and acquisitions associate at Morgan
25	A. No.	25	Stan -- associate, yeah. She was a mergers and

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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	A. No, the only one I pointed Stuart	2	A. Didn't I just say that?
3	Vardaman to was -- was Ruth. Vardaman,	3	Q. If you can, answer the questions that
4	V-A-R-D-A-M-A-N.	4	I've asked you.
5	Q. Did you participate in any job	5	MR. GAGE: Objection.
6	interviews in connection with your hiring by	6	A. Yes.
7	Google?	7	Q. And were you -- at the time you were
8	A. Yeah, I was interviewed.	8	being recruited, were you told what your job title
9	Q. How many times?	9	would be?
10	A. Three.	10	A. No.
11	Q. Were any of those group interviews?	11	Q. At the time you were being recruited,
12	A. I'm sorry, were any of those what?	12	was the future development of the role discussed
13	Q. Group interviews.	13	in any way?
14	A. No.	14	MR. GAGE: Objection.
15	Q. Do you recall who it was that you	15	A. I don't know what that means.
16	interviewed with?	16	Q. At the time you were being recruited,
17	A. Yes.	17	did you have any discussions about where or how
18	Q. And who was that?	18	the role might develop over time?
19	A. I had a phone interview with Tariq	19	A. The role is a new role. It didn't
20	which then led to an in-person interview -- a set	20	exist before, so the role as described it was
21	of in-person interviews in Sunnyvale with Diane	21	future looking. I wasn't replacing somebody. The
22	Greene, Tariq Shaukat again, Greg Moore, Fiona	22	role didn't exist.
23	O'Donnell who was on a video con, and that was it.	23	Q. Were there any discussions on what
24	I was supposed to meet with Kevin Piraino, but he	24	the role might look like down the road in two
25	had not completed the Google interview training so	25	years, five years, anything like that?
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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	we adjourned that one, and then subsequently I met	2	MR. GAGE: Objection.
3	with Brian Stevens in New York personal -- in	3	A. Yeah, yes.
4	person rather, in person I think on Google campus.	4	Q. And what was the discussion with
5	Q. During the time that you were being	5	respect to that?
6	recruited by Google, how was the role for which	6	A. The idea was to build out a team that
7	you were being recruited described to you?	7	was aware of, responsive to regulatory imperatives
8	A. The role that was described to me was	8	globally, help set an agenda for those as well,
9	that in the Cloud the major opportunity for Google	9	help explain them to -- you know, help advocate
10	Cloud was in regulated industries, which had a set	10	for them internally and help sell them externally
11	of imperatives -- a set of customer imperatives	11	to senior -- to the customer -- senior executives
12	that had to be met and that the role I was being	12	and customers, give them assurances that
13	recruited for was two-fold.	13	Google Cloud was a place for regulated industries
14	One to internal facing to help	14	to -- to come do business.
15	explain to a product developer, the engineers why	15	Q. And was it described to you as an
16	those -- what those requirements were and why they	16	individual contributor role or a managing role?
17	matter. And then, two, to act as a bridge to	17	A. Both, because initially there was
18	customers and help give them comfort that Google	18	just me and then ultimately there was to be a team
19	is responsive to the regulatory imperatives that	19	supporting it.
20	they needed to meet in order to adopt Google	20	Q. What was your title when you joined
21	Cloud.	21	Google?
22	Q. Was it described to you that you	22	A. Managing director of technology and
23	would have any role with respect to representing	23	policy I think.
24	Google externally or internally in your industry	24	Q. Was that a title you selected for
25	areas?	25	yourself?

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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	were being paid at McKinsey?	2	Q. And is this the final offer letter
3	A. Probably not.	3	that you received?
4	Q. Do you know whether they were aware	4	A. To my knowledge I -- I signed it, so
5	of what you were being paid at McKinsey?	5	I'm assuming this is the last one. You know, I'm
6	A. Don't know.	6	sorry, to -- to your point, no, to my knowledge
7	Q. At the time that you joined Google,	7	there was no subsequent one. This was it.
8	you still had outstanding RSQs from Morgan -- I'm	8	Q. And did you negotiate any component
9	sorry, outstanding awards, deferred awards from	9	of this offer letter?
10	Morgan Stanley, correct?	10	A. No.
11	A. Correct.	11	Q. If I can direct your attention to the
12	Q. Did you forfeit any of those awards	12	salary.
13	by virtue of joining Google?	13	A. Yes, got it.
14	A. No.	14	Q. The [REDACTED], is that your
15	Q. And so no portion of the initial	15	recollection as to what your salary was at the
16	equity award from Google was replacement equity	16	time you joined?
17	for amounts that you were losing by virtue of	17	A. Yes.
18	joining?	18	Q. Under "Bonus Target" it says, "Your
19	A. Sorry, there's -- there's just a	19	annual bonus target will be 40 percent of your
20	negative embedded in there. I want to make sure	20	base salary." Is that the annual cash bonus that
21	I answer the question properly. So no portion	21	you were referring to when we spoke earlier?
22	was -- yeah -- yes, no portion -- no portion was	22	A. Yes.
23	made good.	23	Q. And with respect to equity
24	Q. Okay. If we can go back to Box,	24	compensation does this reflect that you received
25	we're going to look at another document.	25	[REDACTED]?
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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	A. Okay, let me -- let me minimize. I	2	A. Yeah. So I was basically right when
3	don't need to minimize -- yeah. Got it, okay.	3	I said it before, yeah.
4	Back in the Box, yes.	4	Q. Okay, and do you recall receiving
5	Q. And if you hit refresh, you should	5	both of those awards?
6	see Tab 13.	6	A. Well, both awards were deposited into
7	A. Hold on, let me refresh. Okay, got	7	a -- a brokerage account at Morgan Stanley, yeah.
8	Tab 13. Open it?	8	Q. What was your level in Google at the
9	Q. Right.	9	time of your hire?
10	A. Opened, yes, got it.	10	A. I didn't know. I came to learn I was
11	Q. I'm going to mark --	11	an L 9.
12	A. So Hold on, it keeps giving me hints	12	Q. When did you come to know that you
13	on how to use Box.	13	were an L 9?
14	Okay, got it.	14	A. At some point. I'm sorry, some point
15	Q. We're going to mark this as Exhibit	15	subsequent to my hiring. I -- I don't remember
16	13. Exhibit 13, Bates stamped G002 -- I'm sorry,	16	exactly when.
17	GOOG-ROWE-00060576 through 578.	17	Q. Was it while you were still at
18	(Whereupon, Exhibit 13 was marked at	18	Google?
19	this time.)	19	A. Yeah. Sorry, do you want me to
20	Q. Do you recognize this document?	20	continue looking at this or do you want me to come
21	A. Hold on.	21	back to the video, what would you like?
22	Yes.	22	Q. We're done with this document if you
23	Q. And what do you recognize this	23	want to put it aside.
24	document to be?	24	A. Okay, let me come back to you. Hold
25	A. The offer letter from Google to me.	25	on.

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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	Thank you.	2	industry alliances, something like -- whatever
3	Q. Is a managing director in Google the	3	Tariq's group. They had some name, but something
4	same as a director?	4	like that. Some name like vertical platforms
5	MR. GAGE: Objection.	5	industry alliances I think was probably the name
6	A. I always found that somewhat	6	at the time.
7	confusing. I didn't know -- some of the corporate	7	Q. And it's your testimony that it's
8	titles I didn't understand, so I don't know	8	whatever the group was that Tariq Shaukat managed?
9	whether our managing director and a director are	9	A. Yes.
10	just the same or different.	10	Q. Do you know -- are you familiar at
11	Q. Do you know whether Levels 8 and 9	11	Google with the concept of ladders?
12	are considered director level roles at Google?	12	A. Yes.
13	A. I don't know that.	13	Q. And do you know what your ladder was?
14	Q. Did you negotiate with Google your	14	A. No.
15	level?	15	Q. Was your ladder ever shared with you?
16	A. No. I assume my level was based on	16	A. Not my recollection.
17	my years of experience and my, you know, value to	17	Q. Did you ever see the ladder?
18	the organization.	18	MR. GAGE: Objection.
19	Q. Did they tell you what your level was	19	A. Not to my recollection.
20	based on?	20	Q. What was your reporting line in the
21	A. No, I just assumed that's how they	21	position you held at the time you joined Google?
22	came to conclude it. You know, I had 30-plus	22	MR. GAGE: I'm sorry, can you say
23	years of experience in financial services. I had	23	that again. There was some paper shuffling,
24	worked with, you know, CEOs, a close advisor to	24	Cara.
25	CEOs. In my McKinsey time I also worked with	25	A. Yeah.
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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	financial institutions globally and in times of	2	Q. What was your reporting line in the
3	crisis. So I -- you know, they thought I was	3	position you held at the time you joined Google?
4	sufficiently senior.	4	A. I reported to Tariq Shaukat.
5	Even -- even my time at Google, you	5	Q. Do you recall what Mr. Shaukat's
6	know, I met with very senior people at Google. I	6	title was at the time?
7	met with regulators along with senior people, so	7	A. Well, he was co -- he was
8	that's -- I don't know. Didn't seem -- didn't	8	co-president of Google Cloud along with P.H.
9	surprise me I was a Level 9.	9	Ferrand and he -- I think his corporate title
10	Q. To be clear, though: No one at	10	was -- was senior VP, but I don't remember that
11	Google ever communicated to you the basis for your	11	for sure.
12	level; is that correct?	12	Q. Do you know what his level was?
13	A. Right, other than through my	13	A. Only by hypothesis that if -- if I
14	assumptions.	14	was 9, he had to be 10.
15	Q. At the time you were hired, did	15	Q. Now, at the time you were hired, was
16	anyone on behalf of Google explain to you the	16	it your understanding that you were hired to lead
17	factors that were dictating what your salary,	17	the customer-facing regulatory and compliance
18	bonus, and compensation was?	18	engagement for Google Cloud globally?
19	A. No. No.	19	A. No.
20	THE WITNESS: Sorry, Hope.	20	Q. Was it your understanding that you
21	A. No.	21	would be responsible for building a global team to
22	Q. At the time you joined Google, what	22	work with customers and partners across
23	group or organizational unit did you work in?	23	industries?
24	A. What's it called. Industry	24	A. You're talking about at the time I
25	plat -- industry -- was it vertical platforms and	25	was hired?

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<p style="text-align: right;">Page 70</p> <p>1 - STUART BRESLOW -</p> <p>2 Q. Yes.</p> <p>3 A. That was one component of the job</p> <p>4 that I was hired to do, yes.</p> <p>5 Q. At the time you -- you were hired,</p> <p>6 did you understand that you were expected to work</p> <p>7 closely with the product and engineering teams in</p> <p>8 GT and GPT?</p> <p>9 A. Yes.</p> <p>10 Q. At the time you were hired, did you</p> <p>11 understand that you were being hired into a role</p> <p>12 that was primarily focused on regulatory and</p> <p>13 compliance work?</p> <p>14 A. No.</p> <p>15 Q. Did you understand it to be an</p> <p>16 engineering role?</p> <p>17 A. No.</p> <p>18 Q. Was it your understanding that you</p> <p>19 would be responsible for working with customers</p> <p>20 and partners to explain how Google Cloud meets</p> <p>21 their compliance and regulatory needs?</p> <p>22 A. Yes.</p> <p>23 Q. Was it your understanding that you</p> <p>24 would be responsible for creating a plan for what</p> <p>25 certifications and approvals were needed to</p>	<p style="text-align: right;">Page 72</p> <p>1 - STUART BRESLOW -</p> <p>2 posed, it suggested that -- that it was that to</p> <p>3 the exclusion of all other things. That was one</p> <p>4 component of what I was doing; that was not the</p> <p>5 sole purpose of the role.</p> <p>6 So the things you've now detailed are</p> <p>7 things that were -- were well within the ambit of</p> <p>8 my responsibility there, but I understood that</p> <p>9 question to mean are you -- were you singularly</p> <p>10 doing a regulatory compliance role at Google Cloud</p> <p>11 and the answer was no. It was all those other</p> <p>12 things that you just set out.</p> <p>13 Q. Let me just say it one more time and</p> <p>14 then you can answer yes or no whether it's true or</p> <p>15 not true. Was it your understanding that your</p> <p>16 role was to lead regulatory and compliance on the</p> <p>17 business and customer side for Google Cloud?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. Could you say it again?</p> <p>20 Q. Yes. Was it your understanding that</p> <p>21 your role was to lead regulatory and compliance on</p> <p>22 the business and customer side for Google Cloud?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. At the time I was hired, yes? Ms.</p> <p>25 Greene, at the time I was hired? I'm asking you a</p>
<p style="text-align: right;">Page 71</p> <p>1 - STUART BRESLOW -</p> <p>2 maximize market traction?</p> <p>3 A. No.</p> <p>4 Q. Did you understand at the time you</p> <p>5 were hired that your responsibilities included</p> <p>6 meeting engagement with regulators on regulatory</p> <p>7 issues?</p> <p>8 A. Yes.</p> <p>9 Q. Did you understand that your role was</p> <p>10 global and cross-vertical?</p> <p>11 A. And going back to the</p> <p>12 certifications: So I was not the one creating the</p> <p>13 plan, but I was working with others who created</p> <p>14 the plan. I was the primary input to that, but I</p> <p>15 was not the actual plan creator for the</p> <p>16 certifications.</p> <p>17 Q. So --</p> <p>18 A. That's what in fact I did in my time</p> <p>19 there.</p> <p>20 Q. So I just want to make sure on I'm</p> <p>21 clear on this: Is it your testimony that you did</p> <p>22 not understand the role to be a regulatory and</p> <p>23 compliance-focused role?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. That -- the way the question was</p>	<p style="text-align: right;">Page 73</p> <p>1 - STUART BRESLOW -</p> <p>2 question.</p> <p>3 Q. Is that a question?</p> <p>4 A. Yes, that's a question.</p> <p>5 Q. Yes. At the time you were hired, was</p> <p>6 that your understanding of the role?</p> <p>7 A. That was a major component of the</p> <p>8 role, yes.</p> <p>9 Q. In terms of your qualifications, did</p> <p>10 you understand that for the role that you were</p> <p>11 hired into at Google, you needed to demonstrate a</p> <p>12 comprehensive understanding of how Google shapes</p> <p>13 the industry?</p> <p>14 A. Yeah. (Unintelligible crosstalk) I'm</p> <p>15 sorry -- I'm sorry, yes. I apologize, yes.</p> <p>16 Q. Was another qualification that you be</p> <p>17 recognized as an authority in multiple function</p> <p>18 areas?</p> <p>19 A. Yes.</p> <p>20 Q. Was another qualification that you be</p> <p>21 recognized as a world-class expert and guru both</p> <p>22 inside and external to Google?</p> <p>23 A. Yes.</p> <p>24 Q. Was a qualification that you be</p> <p>25 recognized as a resource for innovation and</p>

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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	groundbreaking development?	2	function, business, and/or industry through advice
3	A. You bet.	3	counsel related to Google technologies and
4	Q. Was a qualification that you work on	4	business strategies?
5	one or more of the company's most complex projects	5	A. Yes.
6	and/or problems?	6	Q. Was another that you act as a
7	A. Yes.	7	technical advisor to several project teams?
8	Q. Was a qualification that you be able	8	A. Yes.
9	to translate business needs into actionable	9	Q. Was another that you consult on
10	initiatives?	10	projects and/or people transitions?
11	A. Sure.	11	A. Yes.
12	Q. Was another qualification that you be	12	Q. Was another that you impact Google's
13	able to anticipate and solve problems across	13	long-term direction and success by contributing to
14	functional groups?	14	setting strategy objectives for key functional
15	A. That's what I've done for my whole	15	areas?
16	career, yeah.	16	A. Yes.
17	Q. Was another qualification that you be	17	Q. Was another that you shape the
18	able to own several complex projects and fully	18	direction and future of the function?
19	commit to their success?	19	A. Yes.
20	A. Yes. Again, that's what I did	20	Q. Was another to ensure that product
21	throughout my entire career.	21	and services are aligned with Google's current and
22	Q. Is another qualification that you	22	future needs and expectations?
23	would be able to apply advanced judgment to	23	A. Yes.
24	develop new solutions and think beyond existing	24	Q. Was another that you impact Google's
25	resolutions, assumptions, or current knowledge of	25	long-term direction and success -- well, you
	Page 75		Page 77
1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	the area and industry?	2	already said yes to that.
3	A. Yeah, that's what senior executives	3	Was another that you shape the
4	do. That's -- yeah, that's what I was hired to	4	direction and future of the organization and
5	do.	5	industry by designing, developing, and
6	Q. Was another qualification that you	6	implementing groundbreaking technologies?
7	contribute to setting strategy objectives to the	7	A. Yes.
8	function?	8	Q. In your role at the time you joined
9	A. Yeah.	9	Google, did you understand your responsibilities
10	Q. Was another qualification that you	10	to include partnering closely with top global
11	arbitrate and advocate the technical issues?	11	companies as their most trusted Google technical
12	A. You better believe it.	12	advisor?
13	Q. Was another that you grow the gold	13	A. The -- yes. Though the one quibble
14	senior level talent pipeline?	14	might be around technical advisor but, yes, that
15	A. Uh-huh. Yes.	15	was -- the idea was for me to be a point of
16	Q. Was another that you have proven	16	contact for important clients in regulated
17	mastery of communication, negotiation, and	17	industries and their senior executives.
18	influence skills?	18	Q. And what's the quibble around
19	A. That was my -- you summed up my	19	technical advisor?
20	career in an -- in an -- in whatever, ten words.	20	A. Just -- just a question of what you
21	Q. Was another that you provide input to	21	mean by "technical."
22	executives?	22	Q. What do you understand it to mean?
23	A. Uh-huh. Yes. Sorry, no uh-huh.	23	A. Well, I understand it to mean to help
24	Yes.	24	them understand how Google Cloud technology
25	Q. Was another that you influence the	25	works. So in that sense, yes, if someone is

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1 - STUART BRESLOW -	1 - STUART BRESLOW -
2 calling -- calling me to talk about, you know, how	2 include public evangelism for emerging
3 do you program something, the answer is no. Again	3 technologies and speaking publicly on those
4 as we established earlier, I don't code and I	4 issues?
5 don't program, but I do deal with senior	5 A. Yes.
6 executives all the time. That's what I do.	6 Q. Did it involve doing deep dives with
7 Q. With respect to your responsibilities	7 internal engineering teams on the key cases for a
8 in the role that you were hired into --	8 given launch?
9 A. Uh-huh.	9 A. Yes.
10 Q. -- is one of your responsibilities	10 Q. Did it include leading a cross-Google
11 identifying Cloud-related designs, development, or	11 technical working team through a critical
12 deployment friction points from the customers'	12 engagement or through critical engagements?
13 perspective and rallying your teams to work	13 A. I'm sorry, say it again. I -- I
14 through solutions?	14 wasn't following.
15 A. I'm sorry, I missed one word in	15 Q. Did it include leading a cross-Google
16 there. I apologize.	16 technical working team through critical
17 Q. Sure. Did it include identifying	17 engagements to customers?
18 Cloud-related design, development, or deployment	18 A. Yes.
19 friction points --	19 Q. In your role, did you need to be at
20 A. Oh, friction point. Okay, that	20 home in a public speaking or a stage-type role?
21 what's I didn't hear. Thank you.	21 MR. GAGE: Objection.
22 Q. -- from the customers' perspective	22 A. Did I need to be in my apartment in a
23 and rally teams to work through solutions?	23 public speaking engagement?
24 A. Yes, absolutely.	24 Q. In your role, did you need to be at
25 Q. Was one of your responsibilities to	25 home on stage?
Page 79	Page 81
1 - STUART BRESLOW -	1 - STUART BRESLOW -
2 work with customers and partners to define joint	2 MR. GAGE: Objection.
3 initiative and co-create their transformation road	3 A. What does that mean?
4 map?	4 Q. Did you need to be comfortable
5 A. Absolutely.	5 presenting publicly in your role?
6 Q. Was part of your responsibilities	6 A. Sure.
7 to tell the Google innovation story and help	7 Q. Did you need to be comfortable or
8 translate it to actionable steps global companies	8 qualified to provide private consultations with a
9 can take towards adoption?	9 trusted advisor?
10 A. Yes.	10 A. Yes.
11 Q. Was part of your responsibilities to	11 Q. Okay. If you can, go back to the
12 collaborate across functional and product area	12 Box.
13 boundaries to bring the best of Google to the	13 A. Okay, give me a second. Okay, so I
14 customer?	14 need to refresh it again?
15 A. Yes.	15 Q. Yes, please.
16 Q. With respect to the role in which you	16 A. Give me one second.
17 were hired at Google, did your days include	17 Okay, so there's now 32, 33 and 34?
18 private whiteboarding sessions with Google	18 Q. Let me make sure I've got the
19 customers?	19 right --
20 A. I'm sorry, you're asking whether the	20 A. So I've got Tab 32 says "Solutions
21 role contemplated it or whether I did it?	21 Consultant," Tab 33 says "Technical Solutions
22 Q. Whether the role either contemplated	22 Consultant," Tab 34 says "GOOG-ROWE-5197."
23 it or in fact you did it.	23 Q. Okay. If you can, open Tab 32.
24 A. A little bit of both, yeah.	24 A. Okay, the solutions consultant. Got
25 Q. Did the role, as you understood it,	25 it.

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1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	A. So I just want you aware: They --	2	MR. GAGE: Objection.
3	they asked that I delay -- delay more time so Hope	3	THE WITNESS: I'm sorry, I apologize.
4	could get the words -- even though I'm leaving	4	A. A few times over the course of the
5	time, I'm not leaving enough so I'm going to leave	5	months.
6	a little more time, just so you know.	6	Q. Did he tell you what efforts Google
7	So -- so the -- so I became the --	7	was undertaking to fill the role?
8	the head of financial services vertical.	8	A. I knew that he was actively
9	Q. And what organization or	9	interviewing candidates for the role and that I
10	organizational unit was that in at -- at Google?	10	knew that at some point he -- he or people offsite
11	A. It was in Tariq Shaukat's	11	presented some of the candidates to Diane Greene.
12	organization, which was industry -- I forget what	12	Q. Do you know who those candidates
13	it's called. You know, industry verticals and	13	were?
14	global alliances or something like that.	14	A. No.
15	Q. And what -- did you continue to	15	Q. Do you know the background or
16	report to Mr. Shaukat in that position?	16	experience of the candidates?
17	A. Yes.	17	A. No.
18	Q. How did it come to be that you moved	18	Q. Do you know whether Ms. Rowe was a
19	into the position of head of financial services	19	candidate?
20	vertical?	20	A. I did come to understand that, yes.
21	A. We spoke -- I don't know whether it	21	Q. When did you come to understand that?
22	was in person or on a hangout or on the phone --	22	A. Sometime -- sometime around the time
23	and he asked if I would take the role.	23	I accepted the role.
24	Q. And when you say "he," who are you	24	Q. How did you come to learn that?
25	referring to?	25	A. Don't recall specifically, but I
	Page 131		Page 133
1	- STUART BRESLOW -	1	- STUART BRESLOW -
2	A. Oh, I'm sorry. Tariq.	2	assume it was from Tariq.
3	Q. And when was that?	3	Q. Your discussions with Mr. Shaukat
4	A. Again, sometime December or January.	4	around the head of financial services vertical
5	I just don't remember specifically when.	5	role, was that in the context of a broader
6	Q. How close in time was it to you	6	reorganization of Tariq's group?
7	assuming the role?	7	A. You mean when he asked me to take on
8	A. Well, basically upon agreeing to do	8	the role or -- or my comments earlier than that?
9	it, I assumed it. There's then the gap to when it	9	Q. Either. Any of the times you
10	was announced.	10	discussed with him the financial services vertical
11	Q. And how long was the gap between when	11	role, was it in the context of talking about a
12	you assumed it and when it was announced?	12	broader reorganization?
13	A. I don't recall, but from the	13	A. Well, the -- in connection
14	documents you showed me this morning it suggested	14	with -- so, again, remembering that I was hired
15	it was a significant period of time.	15	for purposes of this, this role to get Google
16	Q. Prior to that call or hangout with	16	Cloud -- to create a strategy for Google Cloud
17	Mr. Shaukat, had you discussed the head of	17	with regulated industries and then cause that to
18	financial services vertical role with him before?	18	be executed, I thought since financial services
19	A. Only in the sense that it was -- it	19	was probably the anchor of that we really needed
20	was unfilled and I thought it was important to	20	someone to fill that role.
21	have it filled. I did not put myself forth as a	21	And I had a distinct role that
22	candidate for it.	22	was -- either role, it was distinct from that.
23	Q. When did you have that discussion	23	Mine was, as I think you pointed out earlier,
24	with him?	24	across the verticals and then -- so that's -- we
25	A. A few --	25	did talk about that. And then, you know, once he

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Page 134	Page 136
1 - STUART BRESLOW -	1 - STUART BRESLOW -
2 asked me to take on the role, I -- you know, we	2 would require you to execute strategies from a
3 obviously talked about it again then, too.	3 technical and business perspective?
4 Q. Did Mr. Shaukat tell you what the	4 A. Yes.
5 role entailed in that conversation where he asked	5 Q. Did you understand that the role
6 if you would take the role?	6 required extensive experiencing in managing
7 A. No, he didn't have to tell me what it	7 information technology?
8 was. I -- I knew -- I knew what the role	8 A. Yes.
9 entailed having -- I was already at Google Cloud	9 Q. Did you understand that the role
10 for probably six months and I saw what the other	10 required extensive experiencing in managing
11 vertical leads did and I didn't -- you know,	11 computer systems that support enterprise goals?
12 again, he was basically saying, you know, I need a	12 A. No.
13 senior executive in that role to, you know, bring	13 Q. Did you understand that the role
14 coherence to it and so that's what I -- what I	14 required a Ph.D. or a Master of Science degree in
15 did.	15 computer science or related technical field?
16 Q. Did you get -- did he give you or	16 A. No.
17 provide you with a copy of the job description?	17 Q. In the context of Mr. Shaukat's
18 A. Not to my recollection.	18 organization, what did he discuss with you in late
19 Q. Did anyone at that time provide you	19 2018/early 2009 -- late 2018/early 2019 regarding
20 with a copy of the job description?	20 changes that he wanted to make to his
21 A. Not to my recollection.	21 organizational structure.
22 Q. Were you ever asked to interview for	22 A. I don't recall conversations about
23 the role?	23 that.
24 A. Not to my recollection.	24 Q. Okay. If you can go to the Box,
25 Q. Did you ever interview for the role?	25 we're looking for --
Page 135	Page 137
1 - STUART BRESLOW -	1 - STUART BRESLOW -
2 A. Not to my recollection.	2 A. Hold on, I'm trying to find the Box.
3 Q. Now, with respect to that role did	3 Got it.
4 you understand that your responsibilities would	4 Q. Does it have Tab 15?
5 include driving Google's business by developing	5 A. Let me refresh it, hold on a second.
6 product solutions?	6 Tab 15, yes?
7 A. Yes.	7 Q. And --
8 Q. Did you understand that your	8 A. Sorry. Tab 15 is what I'm looking
9 responsibilities in that role would include	9 for?
10 driving business by targeting -- by identifying	10 Q. Yes.
11 M&A targets?	11 A. Right, got it.
12 A. Yes.	12 Q. We're up to Exhibit 18, Bates stamped
13 Q. Did you understand that your role	13 GOOG-ROWE-00056729 through 730.
14 would include developing go-to market approaches	14 (Whereupon, Exhibit 18 was marked at
15 that would resonate with the major companies in	15 this time.)
16 the financial services?	16 Q. Mr. Breslow, do you recognize this
17 A. Yes.	17 document?
18 Q. Did you understand that the role	18 A. Yes, it's an e-mail.
19 required appropriate technical acumen as a crucial	19 Q. And you see that e-mail is dated
20 component?	20 October 13, 2019?
21 A. Yes.	21 A. Right, that's a year later than the
22 Q. Did you understand that the role	22 time frame you've been referring me to. That's a
23 required technical know-how?	23 year later than the period you've been referring
24 A. Yes.	24 me to.
25 Q. Did you understand that the role	25 Q. I understand. Thank you.

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<p style="text-align: right;">Page 142</p> <p>1 - STUART BRESLOW -</p> <p>2 And so it was subsequent to that that</p> <p>3 Tariq said look, we're in this in-between period</p> <p>4 with a new CEO coming; I'm not inclined to go and</p> <p>5 recruit someone to come in and lead the financial</p> <p>6 services vertical right now; you have a deep</p> <p>7 financial services industry background; you know</p> <p>8 how to engage with senior executives, you -- we've</p> <p>9 had a good relationship in terms of you've known</p> <p>10 what to do and how to do it and how to progress</p> <p>11 important things here in the organization; you've</p> <p>12 made a lot of good contacts, created a good</p> <p>13 network and so would you become the head of the</p> <p>14 financial vertical; and then we can re-examine</p> <p>15 later on whether -- on an interim basis we can</p> <p>16 examine later on whether you should become -- you</p> <p>17 know, whether it's -- what we would do to fill</p> <p>18 that role on a more permanent basis, whether it's</p> <p>19 you or somebody else. So that's how it came to</p> <p>20 be.</p> <p>21 And, you know, I was -- when asked to</p> <p>22 serve I said, of course. I liked the opportunity</p> <p>23 and I said yes and did it. There was no</p> <p>24 additional compensation, there was no change to my</p> <p>25 compensation, there was no change to my level,</p>	<p style="text-align: right;">Page 144</p> <p>1 - STUART BRESLOW -</p> <p>2 Q. And did he, in fact, use the word</p> <p>3 "interim"?</p> <p>4 A. He -- my recollection is he did. I</p> <p>5 don't recall that with certainty.</p> <p>6 Q. And did he tell you what would happen</p> <p>7 to you at the time you would examine later on</p> <p>8 if it was -- if you weren't going to be in that</p> <p>9 role permanently?</p> <p>10 A. I wasn't concerned about that.</p> <p>11 Q. My question was: Was it discussed?</p> <p>12 A. I don't recall it because I wasn't</p> <p>13 concerned about it.</p> <p>14 Q. Did Mr. Shaukat say whether he had</p> <p>15 spoken to anyone else with respect to putting you</p> <p>16 in the role?</p> <p>17 A. Not that I recall.</p> <p>18 Q. Did you speak with anyone else with</p> <p>19 respect to you assuming that role?</p> <p>20 A. I may have, but not that I recall.</p> <p>21 Q. Did you have an understanding as to</p> <p>22 whether anyone, other than Mr. Shaukat, was</p> <p>23 involved in the decision to put you into that</p> <p>24 role?</p> <p>25 A. I didn't have an understanding anyone</p>
<p style="text-align: right;">Page 143</p> <p>1 - STUART BRESLOW -</p> <p>2 there was no change to my ladder; none of the</p> <p>3 things you have been pointing to earlier. It was</p> <p>4 taking the job I was doing before and saying okay,</p> <p>5 now this is the job you're doing.</p> <p>6 Q. Is that in the conversation that you</p> <p>7 described earlier where he asked if you wanted to</p> <p>8 take the role?</p> <p>9 A. Yeah, it -- I suspect it was a</p> <p>10 couple -- I don't really recall whether it was</p> <p>11 one conversation or two or three conversations.</p> <p>12 It was -- you know, it was a big deal to make the</p> <p>13 change and so I suspect we had a couple of</p> <p>14 conversations. I just don't recall with any</p> <p>15 precision how many we had and, you know,</p> <p>16 which -- what -- what the substance</p> <p>17 was in each of the conversations, but that's</p> <p>18 effectively the record of the conversations.</p> <p>19 Q. Is there anything else that you</p> <p>20 recall him saying to you or you saying to him in</p> <p>21 the context of him offering you or asking you to</p> <p>22 take on the role of head of financial services?</p> <p>23 A. Not at this moment, but I expect</p> <p>24 there may be things that may refresh my</p> <p>25 recollection.</p>	<p style="text-align: right;">Page 145</p> <p>1 - STUART BRESLOW -</p> <p>2 other than Mr. Shaukat was involved.</p> <p>3 Q. In any of those conversations you</p> <p>4 just described for me whether it was one or a</p> <p>5 series of conversations, was Ms. Rowe discussed?</p> <p>6 A. Not to my recollection.</p> <p>7 Q. Was there any conversation in</p> <p>8 connection with you taking on the head of</p> <p>9 financial services role where Ms. Rowe was</p> <p>10 discussed?</p> <p>11 A. I'm sorry, is that a different</p> <p>12 question than the one you just asked?</p> <p>13 Q. It is.</p> <p>14 A. Can you repeat it then? I'm not</p> <p>15 following.</p> <p>16 Q. Sure. So, more generally, was -- in</p> <p>17 any conversation where your -- where your change</p> <p>18 in role was discussed, was Ms. Rowe discussed?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. Well, at some point I came to know</p> <p>21 that she had, you know, interviewed for the job</p> <p>22 when Diane Greene was at -- at Google Cloud. So I</p> <p>23 don't know -- I'm -- I'm sorry, I -- I apologize.</p> <p>24 I'm just not following the -- the question you're</p> <p>25 trying -- what you're trying to get at.</p>

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146 to 149

	Page 146	Page 148
1	- STUART BRESLOW -	- STUART BRESLOW -
2	Q. We'll come back to it.	A. With respect to regulatory
3	A. Okay.	technology?
4	Q. Aside from what you've already told	Q. Deep expertise.
5	me, did Mr. Shaukat communicate anything to you in	A. Well, now you changed it to
6	addition about why he was selecting you for the	"regulatory technology," right, that was your last
7	role?	question?
8	A. Yeah, I -- as I described, you know,	Q. My last question.
9	he knew that I knew my way around the financial	A. Right. Do I have deep expertise with
10	services industry. I had -- he was well-aware of	respect to regulatory technology? In terms of the
11	my background.	people who do this for a living, I have as good
12	I had been in financial services from	a -- a knowledge of it as most anyone can.
13	'87 to 2017. I had worked at the highest	Q. Do you have any understanding as to
14	levels of the industry. I've worked with senior	how your knowledge of regulatory technology
15	regulators, which was important to the role. He	compares to Ms. Rowe's knowledge?
16	knew about my experience as a -- as a partner at	A. No.
17	McKinsey because he, too, had been a partner at	Q. Now, either internally or externally
18	McKinsey and he knew what -- you know, what the	did you designate yourself as the head of
19	rigors are of being a partner at McKinsey and how	financial services on an interim basis?
20	one engages the senior executives at McKinsey; and	MR. GAGE: Objection.
21	he knew that I had -- he knew that I created in a	A. Did I designate myself? Not to my
22	relatively short order a very strong network at	recollection -- well, I'm sorry, you are
23	Google Cloud. I had people all over the	asking -- is the keyword "interim" or "head of
24	organization who were looking to me for support	financial" services or both?
25	and guidance.	Q. Let's -- let -- let me ask you a
	Page 147	Page 149
1	- STUART BRESLOW -	- STUART BRESLOW -
2	So -- and he was well-aware of those	different question. One is: Did you tell people
3	things when we talked about the role.	that you were the head of financial services on an
4	Q. At that time, did you consider	interim basis?
5	yourself to be an expert in technology?	A. May have.
6	A. Excuse me --	Q. Who?
7	MR. GAGE: Objection.	A. I -- I -- I have no specific -- I'm
8	A. I -- I don't know, and I'm not trying	sorry the way I'm saying it, but I have no
9	to be clever. I had sufficient expertise in	specific recollection. Again, these are things
10	technology to speak cogently with the customer	that didn't matter to me.
11	base at Google as well as with the sales force, as	Q. Did you -- when speaking of your
12	well as with the engineers, as well as with the	role, did you say head of financial services or
13	in -- the infrastructure teams. So that's --	interim the head of financial services?
14	that's -- that was the level of expertise I needed	A. I said head of financial services.
15	to do my job.	Q. And is that how Mr. Shaukat also
16	Q. Beyond having enough to speak	referred to you?
17	cogently about it, would you consider yourself to	A. I don't know.
18	be an expert in technology?	Q. And in the head of financial services
19	A. I --	role, did you meet with Ruth Porat?
20	MR. GAGE: Objection.	A. Well, I met with Ruth several times
21	A. Yeah, my answer is my answer.	while I was at Google Alphabet. We had a meeting
22	Q. Do you consider yourself to have	with [REDACTED] who was the [REDACTED]
23	deep, deep technological expertise with respect to	[REDACTED], along with -- along with Thomas Kurian
24	regulatory technology?	and a couple of other people, and I presented on
25	MR. GAGE: Objection.	the Cloud to a -- to a -- to [REDACTED] and a couple

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150 to 153

<p style="text-align: right;">Page 150</p> <p>1 - STUART BRESLOW -</p> <p>2 of his colleagues. We met with ██████████,</p> <p>3 who was a senior a -- a senior official at the</p> <p>4 ██████████ working for ██████████ who</p> <p>5 both Ruth and I knew from Morgan Stanley days, and</p> <p>6 we talked about the financial modernization and</p> <p>7 the role of Cloud in financial modernization.</p> <p>8 In addition, the guy who was head of</p> <p>9 compliance at GP abruptly resigned and Ruth called</p> <p>10 me late on a Friday to say could I please get</p> <p>11 involved and figure out whether there were issues</p> <p>12 of concern there and how we might effectively</p> <p>13 ensure good controls at Google Pay; and in</p> <p>14 addition, she asked me to help in the search for a</p> <p>15 successor for that person.</p> <p>16 So those are among the contacts I had</p> <p>17 with a -- with Ruth after -- after the -- and --</p> <p>18 and -- and I -- and, and, you know, after I became</p> <p>19 head of -- of the vertical, but they were not</p> <p>20 occasioned by me. She -- she found me and she</p> <p>21 knew me. We probably had, I don't know, three or</p> <p>22 four hallway conversations as well.</p> <p>23 Q. At some point in time, did you</p> <p>24 discuss with Mr. Shaukat what role Ms. Rowe would</p> <p>25 have going forward? And now I'm focusing on the</p>	<p style="text-align: right;">Page 152</p> <p>1 - STUART BRESLOW -</p> <p>2 financial services, but that she would have a</p> <p>3 broader role as OC -- in OCTO. It would not be</p> <p>4 one where she would effectively be doing financial</p> <p>5 services -- dedicated financial services work. In</p> <p>6 OCTO, she'd be covering many industries.</p> <p>7 Q. Prior to that -- when was that</p> <p>8 conversation?</p> <p>9 A. I don't recall specifically. It was</p> <p>10 sometime after January and sometime before April.</p> <p>11 Q. Prior to that, did you have any</p> <p>12 discussions with Mr. Shaukat regarding Ms. Rowe</p> <p>13 reporting in to you?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. We may have. Again, I was -- I -- I</p> <p>16 probably told him I was happy to have her work</p> <p>17 with me. I -- you know, as I said to you earlier,</p> <p>18 I -- I thought she was someone who I could work</p> <p>19 with and we really -- I could help advance her</p> <p>20 career had she -- had she worked with me.</p> <p>21 Q. Did you discuss with Mr. Shaukat what</p> <p>22 her responsibilities would be relative to yours?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. I'm sorry, when -- when she went to</p> <p>25 OCTO?</p>
<p style="text-align: right;">Page 151</p> <p>1 - STUART BRESLOW -</p> <p>2 time after the conversation that you just</p> <p>3 described as to with respect to how you learned</p> <p>4 you were going to have that role.</p> <p>5 A. Yeah, I -- I talked about it. You</p> <p>6 know, basically, it was between him and Ulku as to</p> <p>7 how they were going to go forward. I certainly,</p> <p>8 again as I indicated earlier, welcomed her into</p> <p>9 the group and would have wished to have been</p> <p>10 there, but that was between -- the two of them</p> <p>11 discussed it. All I cared about was getting some</p> <p>12 clarity so that the organization knew who was</p> <p>13 doing what.</p> <p>14 Q. Tell me everything you said to Mr.</p> <p>15 Shaukat and everything he said to you with respect</p> <p>16 to what Ms. Rowe's role would be going forward.</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. So I came to learn at some point</p> <p>19 that she didn't -- that she wanted -- that she</p> <p>20 didn't find working in the Cloud, in the financial</p> <p>21 services vertical acceptable and that she was</p> <p>22 going to transition back to OCTO; and that</p> <p>23 the -- the conversation I had with Tariq about it</p> <p>24 was he let me know that she was doing that and</p> <p>25 that in doing that she would not be dedicated to</p>	<p style="text-align: right;">Page 153</p> <p>1 - STUART BRESLOW -</p> <p>2 Q. Prior to that.</p> <p>3 A. When what --</p> <p>4 Q. During the period of time</p> <p>5 between when you became the head of financial</p> <p>6 services in late 2018/early 2019 and when she left</p> <p>7 to go back to OCTO --</p> <p>8 A. Right.</p> <p>9 Q. -- did you discuss with Mr. Shaukat</p> <p>10 how -- what her role and responsibilities would be</p> <p>11 as compared to what your role and responsibilities</p> <p>12 would be?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. I don't recall a specific</p> <p>15 conversation about it, but I viewed her as my</p> <p>16 partner and wanted to -- you know, and as</p> <p>17 welcome -- was open to having her work with me and</p> <p>18 to figure out some way to -- to do that together.</p> <p>19 Q. What did you understand her role and</p> <p>20 responsibilities to be at that time?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. All -- all I knew about what Ulku was</p> <p>23 doing was that she was doing a lot of client</p> <p>24 outreach and a lot of presentat -- you know,</p> <p>25 presentations at conferences which, you know,</p>